

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHSHORE SHEET METAL,  
INC.,

Plaintiff,

v.

SHEET METAL WORKERS  
INTERNATIONAL ASSOCIATION,  
LOCAL 66,

Defendant.

Case No. 2:15-cv-01349 MJP

**SUPPLEMENTAL DECLARATION OF  
CHRISTOPHER L. HILGENFELD IN  
SUPPORT OF PLAINTIFF'S MOTION TO  
COMPEL DISCOVERY**

**Noted on Motion Calendar: March 11, 2016**

I, CHRISTOPHER L. HILGENFELD, declare as follows:

1. I am over the age of eighteen (18) years and I am competent to testify if called upon to do so.

2. I am an attorney at Davis Grimm Payne & Marra, counsel of record for Plaintiff Northshore Sheet Metal, Inc. ("Northshore" or "Defendant"), admitted to practice in the U.S. District Court, Western District of Washington. I am the lead attorney

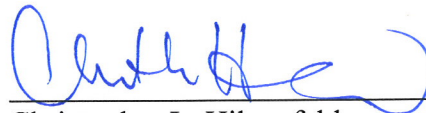
1 representing Northshore Sheet Metal, Inc. in the above-captioned matter, and I make this  
2 declaration based upon my personal knowledge and review of the files and records herein.

3 3. Attached hereto as **Exhibit 1** is a true and correct copy of an undated letter  
4 sent from Tim Carter, Local 66 Business Manager, to the Building Trades Crafts. The  
5 Union failed to produce this letter during discovery. I found this correspondence during my  
6 informal investigation.

7 4. Attached hereto as **Exhibit 2** is a true and correct copy of Defendant's  
8 Requests for Production to Northshore Sheet Metal, Inc., dated November 20, 2015.  
9 Defendant sought and Plaintiff produced all contracts for construction projects performed by  
10 Northshore.

11 I declare under penalty of perjury under the laws of the State of Washington and the  
12 United States that the foregoing statements are true and accurate.

13 Dated at Seattle, Washington this 11 day of MARCH, 2016.

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17 Christopher L. Hilgenfeld  
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